UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of COMMONWEALTH OF PUERTO RICO, et al., Debtors.[1]	PROMESA Title III No. 17 BK 3283-LTS (Jointly Administered)

**MOTION OF THE GOVERNMENT DEVELOPMENT BANK FOR PUERTO RICO
AND THE PUERTO RICO FISCAL AGENCY AND FINANCIAL ADVISORY
AUTHORITY FOR LEAVE TO SUBMIT SPANISH LANGUAGE CASE LAW AND
FOR EXTENSION OF TIME TO FILE CERTIFIED TRANSLATIONS**

TO THE HONORABLE COURT:

The Government Development Bank for Puerto Rico (the "GDB") and the Puerto Rico

Fiscal Agency and Financial Advisory Authority ("AAFAF"), through the undersigned attorneys,

respectfully state as follows:

1.   Today, AAFAF and the GDB filed their *Objection of the Government Development*

Bank for Puerto Rico and the Puerto Rico Fiscal Agency and Financial Advisory Authority to the

Urgent Motion of Official Committee of Unsecured Creditors, Pursuant to Bankruptcy Code

Sections 105(a) and 362, for Entry of Order Enforcing Automatic Stay and Court's June 29, 2017

Order Confirming Application of Automatic Stay with Respect to GDB Restructuring (the

"Objection") [ECF No. 3826].

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[1] The Debtors in these Title III Cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); and (ii) The Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566) (Last Four Digits of Federal Tax ID: 9686).

2.   In support of the arguments included in the Objection, AAFAF and GDB cited various cases from the Puerto Rico Supreme Court including: *Rodríguez Román v. Banco Gubernamental de Fomento para Puerto Rico*, 151 D.P.R. 383 (2000), *Commoloco of Caguas, Inc. v. Benítez Díaz*, 126 D.P.R. 478 (1990) and *Amieiro Gozález v. Pinnacle Real Estata Home Team,* 173 D.P.R. 363 (2008) (jointly, the "Spanish Case Law"). Nevertheless, due to time constrains, AAFAF and GDB were unable to translate the Spanish Case Law from their original Spanish language. Accordingly, AAFAF and GDB seek leave from this Court to submit the Spanish Case Law and request an extension of seven (7) days to file certified English translations of the Spanish Case Law pursuant to Local District Court Rule 5(g).

3.   AAFAF and GDB have diligently tried to obtain certified translations of these documents. Nevertheless, they have not had sufficient time to obtain certified translations. AAFAF and GDB are in the process of doing so on an expedited basis.

4.   Accordingly, AAFAF and GDB respectfully request that the Court enter an order substantially in the form attached hereto as **Exhibit A** (the "Proposed Order") granting AAFAF and GDB until September 5, 2018 to submit the certified translations of the Spanish Case Law.

WHEREFORE, AAFAF and GDB respectfully request this Honorable Court enter the Proposed Order attached as **Exhibit A** hereto and grant such other relief as is just and proper.

Dated: August 29, 2018
        San Juan, Puerto Rico

Respectfully submitted,

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Exhibit A

Proposed Order